

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America)	1:21-mj-30395
v.)	Judge: Morris, Patricia T.
Eddie Earl Hendrickson)	Filed: 08-13-2021
)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December, 2019 - February, 2020 in the county of Bay and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC § 1028	Identity theft
18 USC § 1028A	Aggravated identity theft
18 USC § 1344	Bank fraud

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

Complainant's signature

Jeffery Brooks, Special Agent, US Secret Service

Printed name and title

Sworn to before me and signed in my presence
and/or by electronic means.

Date: August 13, 2021

Judge's signature

City and state: Detroit, Michigan

Elizabeth A. Stafford, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Jeffery Brooks, being duly sworn, depose and state:

1. I am a special agent with the United States Secret Service (USSS) in the Department of Homeland Security and have been so employed for approximately two years. I am assigned to the Saginaw Resident Office under the Detroit Field Office. I have been so employed since June 2019. I attended the Federal Law Enforcement Training Center (FLETC) where I received training in federal criminal statutes including fraud and identity theft. After graduating from FLETC I attended the USSS John J. Rowley Training Center (JJRTC) where I received further instruction in federal criminal statutes and their investigations including fraud and identity theft.
2. The information included in this affidavit is provided for the sole purpose of establishing probable cause that between December, 2019 and February, 2020, Eddie Earl HENDRICKSON, using the stolen Social Security Number of PERSON "A" without lawful authority, fraudulently obtained \$201,080.02 in loans from financial institutions and used that money to fraudulently purchase 15 off-road vehicles, motorcycles, and motor vehicles, and thereby committed the below listed offenses:
 - a. Using a means of identification with the intent to commit a violation of Federal law - 18 USC § 1028
 - b. Aggravated identity theft - 18 USC § 1028A
 - c. Executing scheme to defraud financial institution - 18 USC § 1344

This affidavit does not contain all of the investigative facts known to me.

3. On 12.23.2019, according to the Honda Financial credit application, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan at Bay Cycle Sales in Bay City, MI. The auto loan was granted by Honda Finance for two 2019 Honda Motorcycles totaling \$21,000.36 in loss.
4. On 12.28.2019, according to Financial Plus Credit Union credit application, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan at Shiawassee Sports Center in Birch Run, MI. The auto loan was granted by Financial Plus Credit Union for two 2020 Polaris Sportsman 570 ATVs totaling \$17,563.08 in loss.
5. On 12.30.2019, according to Ally Financial credit application, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan at Brighton Chrysler, Dodge, Jeep in Brighton, MI. The auto loan was granted by Ally Financial for a 2012 Jeep Grand Cherokee totaling \$21,658.00 in loss.

6. On 1.8.2020, according to Security Credit Union credit application, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan at Shiawassee Sports Center in Birch Run, MI. The auto loan was granted by Security Credit Union for two 2020 Polaris Outlaw ATVs totaling \$7439.88 in loss.
7. On 1.9.2020, according to Ally Financial credit application, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan at Brighton Chrysler, Dodge, Jeep in Brighton, MI. The auto loan was granted by Ally Financial for a 2015 Ram 1500 Rebel totaling \$26,267.64 in loss.
8. On 1.10.2020, according to PNC Bank credit application, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan at Automania in Dearborn Heights, MI. The auto loan was granted by PNC Bank for a 2018 Dodge Charger totaling \$36,468.70 in loss.
9. On 1.13.2020, according to Citizens Bank credit application, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan at Extreme Dodge / Truck in Jackson, MI. The auto loan was granted by Citizens Bank for a 2019 Dodge Charger totaling \$36,186.00 in loss.
10. On 1.14.2020, according to Citibank and Honda Finance credit applications, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan and Honda Powersports credit card at Genthe Power Sport in Southgate, MI. The auto loan and credit card were granted by and Honda Finance Citibank respectively. Two 2019 Honda ATVs worth \$7592.96 were financed on the Honda credit card with Citibank as the card provider. One 2019 Honda Motorcycle worth \$10,044.36 was purchased via Honda Finance credit application. Total loss was \$17,637.32.
11. On 1.31.2020, according to Honda Finance credit application, HENDRICKSON utilized a fraudulently obtained social security number and Michigan Driver's License to apply for an auto loan at Bay Cycle Sales in Bay City, MI. The auto loan was granted by Honda Finance for one 2019 Honda Motorcycle totaling \$12,459.04 in loss.
12. On 2.18.2020, according to Citi Bank credit card records, HENDRICKSON utilized his previously obtained fraudulent Honda Powersports credit card to purchase a 2019 Honda Motorcycle at Norde Ride Motor Sports in Mt. Morris, MI. Total loss was \$4400.00.
13. On 3.20.2020, Lt. Zak with the Genesee County Sheriff's Office made contact with the victim PERSON "A" whose social security number was used in the aforementioned fraudulent

transactions. Victim shared a similar name with HENDRICKSON. Victim confirmed he had his social security number assigned at birth and never allowed anyone to use his social security number nor his identity in any way.

14. On 4.7.2020, HENDRICKSON was interviewed by Lt. Zak and SA Bryan (USSS) at the Genesee County Jail. HENDRICKSON was arrested on unrelated offenses. Post-Miranda, HENDRICKSON admitted to participating in a scheme to obtain vehicles fraudulently. He admitted to utilizing the previously mentioned victim's social security number on the loan applications. He admitted to using a fraudulent Michigan Driver's License with the victim's information in this scheme. He admitted to picking the vehicles up from the dealerships and bringing them back to his home.
15. On 7.29.2020, the tracking capabilities of the two Chargers mentioned in bullet points (8) and (9) were activated. They were tracked to an address of 4208 Comstock Ave in Flint, MI. Flint police responded and confirmed the two Chargers at that address were the two procured by HENDRICKSON. The individual at that address advised he was storing them for HENDRICKSON.
16. According to the lending institutions, there have been no payments made on any of the loans resulting in a total loss on all loans.
17. Based on this information, there is probable cause to believe that between December, 2019 and February, 2020, Eddie Earl HENDRICKSON committed the offenses of:
 - a. 18 USC § 1028 – Identity theft
 - b. 18 USC § 1028A – Aggravated identity theft
 - c. 18 USC § 1344 – Bank fraud

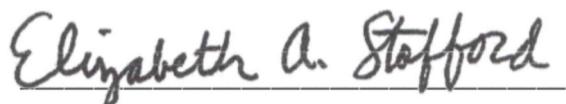


J. Brooks A 15649

Jeffery Brooks

Special Agent – United States Secret Service

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Elizabeth A. Stafford

Hon. Elizabeth A. Stafford

United States Magistrate Judge